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February 09, 2016

Honorable Laura Taylor Swain  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Radivoy v. Life Insurance Company of North America*  
Civil Action No.: 16-CV-181  
R&T File No.: 820345

Honorable Judge:

I represent the Defendant Life Insurance Company of North America ("LINA") in connection with the above referenced matter. At this time, I respectfully request an extension of time to answer the plaintiff's Complaint. I have spoken with the plaintiff's attorney (Jeffrey DeLott, Esq.) and he has consented to my request to extend my time to answer the plaintiff's Complaint until February 17, 2016.

I have not requested this relief previously. The answer was originally due February 3, 2016. Unfortunately there was a delay in forwarding the Complaint to my office and I have not yet received the voluminous claim file which I require in order to draft the Answer.

Respectfully Yours,  
**RUSSO & TONER, LLP**

\_\_\_\_\_/s/\_\_\_\_\_  
Kevin G. Horbatiuk, Esq.

cc: Jeffrey DeLott, Esq.